

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: DONALD ROBERT MASKER, III and	:	CHAPTER 13
HEATHER LEE MASKER	:	
Debtors	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
DONALD ROBERT MASKER, III and	:	
HEATHER LEE MASKER	:	
Respondents	:	CASE NO. 5-23-bk-00085

TRUSTEE'S OBJECTION TO DEBTORS' EXEMPTIONS

AND NOW, this 31st day January, 2023, comes Jack N. Zaharopoulos,

Standing Chapter 13 Trustee, and objects to the debtors' exemptions for the following reason(s):

1. 11 U.S.C. § 522(11)(A). Debtors' exemption of 100% of Fair Market Value without proof of the asset's value deprives unsecured claimants of the asset's value to the estate if it was liquidated under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Trustee requests Your Honorable Court to sustain Trustee's
Objection to Debtors' Exemptions.

Respectfully submitted,

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717)566-6097

BY: /s/Agatha R. McHale
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 31st day January, 2023, I hereby certify that I have served the within Objection by electronically notifying parties or depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Carlos Sabatini, Esquire
216 North Blakely Street
Dunmore, PA 18512

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee